

**IN THE UNITED STATES BANKRUPTCY
COURT FOR THE SOUTHERN DISTRICT OF
TEXAS HOUSTON DIVISION**

In re:	§	
	§	
Fieldwood Energy III LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
Post-Effective Date Debtors¹.	§	Chapter 11
	§	
	§	Jointly Administered

**STIPULATION AND AGREED ORDER EXTENDING RESPONSE DATE AND
RESETTING HEARING DATE ON PLAN ADMINISTRATOR’S OBJECTION TO
COX OIL, LLC, ET AL.’S PROOFS OF CLAIM
[this relates to Dkt. No. 2828]**

This stipulation and agreement (the “**Stipulation**”) is entered into by and among (i) David Dunn, the plan administrator (the “**Plan Administrator**”) appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016])²; and (ii) Cox Oil, LLC and related entities (collectively “**Cox**”)³ regarding the Plan Administrator’s Objection to Cox’s Proofs of Claim [Docket No. 2828] (the “**Objection**”). The Parties hereby stipulate and agree as follows:

WHEREAS, on or about November 25, 2020, Cox timely filed separate Proofs of Claim Nos. 747, 748, 753, 754, 755, 759, 764, 766, 767, 768, 769, 770, 771 and 774 (collectively, the “**Cox**

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

³ The Claimants include Cox Oil, LLC, Cox Operating LLC, Energy XXI GOM, LLC, Energy XXI Gulf Coast, Inc., Energy XXI Onshore, LLC, Energy XXI Pipeline, LLC, Energy XXI Pipeline I, LLC, Energy XXI Pipeline II, LLC, M21K, LLC, and EPL Oil & Gas, Inc.

Initial Claims”).

WHEREAS, on October 11, 2021, Cox timely filed Proofs of Claim Nos. 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030 and 1031 (collectively, the “**Cox Rejection Damages Claims**”).

WHEREAS, on October 11, 2021, Cox also filed an Application of Cox Entities for Allowance of Administrative Claim [Doc. No. 2082 and POC No. 1032] (the “**Cox Administrative Claim**”).

WHEREAS, the Plan Administrator filed his Objection on August 15, 2023, which included a response date of September 14, 2023 and an initial pre-trial hearing on October 2, 2023 at 10:30 a.m. CT.

WHEREAS, the Parties have agreed to enter into and jointly submit this Stipulation extending Cox’s response date and resetting the date of the initial pre-trial hearing in connection with the Objection.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. Cox’s deadline to respond to the Objection is extended to and through October 5, 2023, subject to further extensions based on the Parties’ agreement.
2. The initial pre-trial hearing on the Objection is reset to November 6, 2023 at 10:00 a.m. CT, or such later time as the Court directs.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first written below.

IT IS SO ORDERED

Dated: _____

UNITED STATES BANKRUPTCY JUDGE
MARVIN ISGUR

BOND ELLIS EPPICH SCHAFFER JONES LATHAM & WATKINS LLP

/s/ Aaron Guerrero

Ken Green
Texas Bar No. 24036677
Aaron Guerrero
Texas Bar No. 24050698
Bryan Prentice
Texas Bar No. 24099787
950 Echo Lane, Suite 120
Houston, Texas 77024
(713) 335-4990 telephone
(713) 335-4991 facsimile
Ken.green@bondsellis.com
Aaron.guerrero@bondsellis.com
Bryan.prentice@bondsellis.com

**ATTORNEYS FOR DAVID DUNN, PLAN
ADMINISTRATOR FOR THE POST-
EFFECTIVE DATE DEBTORS**

/s/ Misha E. Ross

Misha E. Ross
(admitted *pro hac vice*)
1271 Avenue of the Americas
New York, New York 10020
(212) 906-1200 telephone
(212) 751-4864 facsimile
misha.ross@lw.com

**ATTORNEYS FOR COX OIL, LLC,
COX OPERATING LLC, ENERGY
XXI GOM, LLC, ENERGY XXI GULF
COAST, INC., ENERGY XXI
ONSHORE, LLC, ENERGY XXI
PIPELINE, LLC, ENERGY XXI
PIPELINE I, LLC, ENERGY XXI
PIPELINE II, LLC, M21K, LLC, AND
EPL OIL & GAS, INC.**